

FILED  
Clerk  
District Court

JUN - 1 2006

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

1 LEONARDO M. RAPADAS  
United States Attorney  
2 JAMIE D. BOWERS  
Assistant United States Attorney  
3 DISTRICT OF THE NORTHERN  
MARIANA ISLANDS  
4 Horiguchi Building, Third Floor  
P. O. Box 500377  
5 Saipan, MP 96950-0377  
Telephone: (670) 236-2986  
6 Fax: (670) 236-2985

7 Attorneys for United States of America

8 UNITED STATES DISTRICT COURT  
9 NORTHERN MARIANA ISLANDS

10 UNITED STATES OF AMERICA )  
11 )  
Plaintiff, )  
12 v. )  
13 FRANK N. BAZA, )  
14 Defendant. )

Criminal Case No. 05-00028-001

**GOVERNMENT'S MOTION FOR  
SUBSTANTIAL ASSISTANCE  
DEPARTURE UNDER USSG §5K1.1  
AND 18 U.S.C. §3553(e)**

15 Pursuant to Section 5K1.1 of the United States Sentencing Guidelines, and Title  
16 18, United States Code, Section 3553(e), the plaintiff, United States of America, hereby moves  
17 the Court to depart from the Sentencing Guidelines and the statutory mandatory minimum  
18 sentence, based on defendant's substantial assistance to the government.

19 The government recommends a 50% departure from guideline-level 29 (range 108-135  
20 months), to a **sentence of 54 months**.

21 Respectfully submitted,

22 LEONARDO M. RAPADAS  
23 United States Attorney  
24 Districts of Guam and NMI

25 By:   
26 \_\_\_\_\_

JAMIE D. BOWERS  
Assistant United States Attorney